



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 13, 2021

**BY EMAIL**

Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Niloufar Bahadorifar et al.*,  
21 Cr. 430 (RA)**

Dear Judge Gorenstein:

On July 8, 2021, a superseding indictment, S1 21 Cr. 430 (RA) (the "Superseding Indictment"), was returned in the above-captioned matter and filed under seal, together with warrants for the arrests of the charged defendants. The Government respectfully requests that the Superseding Indictment and warrants be unsealed. This request is made to this Court because the assigned District Judge is presently unavailable.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

SO ORDERED:

GABRIEL W. GORENSTEIN,  
U.S.M.J.

July 13, 2021

By:

Michael D. Lockard / Matthew J.C. Hellman  
/ Jacob H. Gutwillig  
Assistant United States Attorneys  
(212) 637- 2193 / 2278 / 2215